

OUTTEN & GOLDEN LLP

Justin M. Swartz
Molly A. Brooks
Sally J. Abrahamson
3 Park Avenue, 29th Floor
New York, New York 10016
Telephone: (212) 245-1000

SHAVITZ LAW GROUP, P.A.

Gregg I. Shavitz, admitted *pro hac vice*
Susan H. Stern, admitted *pro hac vice*
1515 S. Federal Hwy, Suite 404
Boca Raton, Florida 33432
Telephone: (561) 447-8888

FITAPELLI & SCHAFFER, LLP

Brian S. Schaffer
Frank Mazzaferro
475 Park Avenue South, 12th Floor
New York, New York 10016
Telephone: (212) 300-0375

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KRISTINA KUCKER, SONNY URBINE,
HILLARY ANDERSON, MAGDA
ALEXANDRA SERENO, AMY DOIDGE, JILL
FILIPPONE, and HEATHER BRADSHAW, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

-against-

PETCO ANIMAL SUPPLIES STORES, INC.,

Defendant.

No. 14 Civ. 9983 (DCF)

**PLAINTIFFS' NOTICE OF MOTION FOR CONDITIONAL CERTIFICATION AND
COURT-AUTHORIZED NOTICE
PURSUANT TO SECTION 216(b) OF THE FLSA**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of their Motion for Conditional Certification and Court-Authorized Notice Pursuant to Section 216(b) of the FLSA, the Declaration of Molly A. Brooks, and the exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) Conditionally certifying the proposed collective pursuant to 29 U.S.C. § 216(b) and authorizing notice to be issued to collective members;

- (2) Ordering Defendant to produce a computer-readable data file within 10 days of the Court's decision, containing, for each collective member: (a) name; (b) last known mailing address(es); (c) last known telephone number(s); (d) last known email address(es); (e) dates of work and work locations; and (f) Social Security number;
- (3) Authorizing Plaintiffs to mail and email the proposed Notice and Consent to Join form and the Reminder Postcard to the Collective; and
- (4) Authorizing the creation of an interactive standalone website through which the Collective can submit Consent to Join forms.

Dated: New York, New York
August 31, 2015

Respectfully submitted,

OUTTEN & GOLDEN LLP

By: /s/ Molly A. Brooks
Justin M. Swartz
Molly A. Brooks
Sally J. Abrahamson
3 Park Avenue, 29th Floor
New York, New York 10016
Telephone: (212) 245-1000

SHAVITZ LAW GROUP, P.A.

Gregg I. Shavitz, admitted *pro hac vice*
Susan H. Stern, admitted *pro hac vice*
1515 S. Federal Hwy, Suite 404
Boca Raton, Florida 33432
Telephone: (561) 447-8888

FITAPELLI & SCHAFFER, LLP

Brian S. Schaffer
Frank Mazzaferro
475 Park Avenue South, 12th Floor
New York, New York 10016
Telephone: (212) 300-0375